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 Tarsadia Hotels; Tushar Patel; B.U. Patel; Gregory  
 Casserly; 5th Rock, LLC; MKP One, LLC; and  
 Gaslamp Holdings, LLC  
 and Third Party Claimant, 5<sup>th</sup> Rock, LLC, et al.

**UNITED STATES DISTRICT COURT**  
**SOUTHERN DISTRICT OF CALIFORNIA**

DEAN BEAVER and LAURIE BEAVER,  
*et al.*,

Plaintiffs,

vs.

TARSADIA HOTELS, *et al.*,

Defendants.

Case No. 11-cv-1842-GPC (KSC)  
 (Related to Case No. 3:09-cv-02739-  
 GPC (BLM))

**DECLARATION OF FREDERICK  
 H. KRANZ IN SUPPORT OF  
 TARSADIA DEFENDANTS'  
 MOTION TO EXCLUDE  
 TESTIMONY OF PLAINTIFFS'  
 EXPERT WITNESS, ORELL C.  
 ANDERSON**

5TH ROCK, LLC, *et al.*,

Third Party Claimants,

vs.

GREENBERG TRAURIG, LLP, and ZOE  
 1 through ZOE 50, inclusive,

Third Party Defendants.

Date:  
 Time: 1:30 p.m.  
 Judge: Hon. Gonzalo p. Curiel  
 Ctrm.: 2D

Complaint filed: August 17, 2011

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8 and Third Party Claimant, 5<sup>th</sup> Rock, LLC, et al.

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**DECLARATION OF FREDERICK H. KRANZ**

I, Frederick H. Kranz, declare and affirm as follows:

1. I am a member of the California State Bar in good standing, admitted to practice in the United States District Court for the Southern District of California, and am a partner with the law firm of Cox, Castle & Nicholson LLP ("CCN"). CCN is counsel of record for Defendants Tarsadia Hotels, Tushar Patel, B.U. Patel, Gregory Casserly, 5th Rock, LLC, MKP One, LLC, and Gaslamp Holdings, LLC (the "Tarsadia Defendants") in the current action. I make this declaration in support of the Tarsadia Defendants' Motion to Exclude the Testimony of Plaintiffs' Expert, Orell C. Anderson. I have personal knowledge of the matters stated in this declaration.

2. Attached hereto as **Exhibit 1** are true and correct copies of excerpts from the deposition of Orell C. Anderson taken on May 9, 2013.

3. Attached hereto as **Exhibit 2** is a true and correct copy of the S&P/Case-Shiller Methodology, dated July 2016.

4. Attached hereto as **Exhibit 3** is a true and correct copy of the 2012-2013 Edition of the Uniform Standards of Professional Appraisal.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on July 29, 2016, at Irvine, California.

  
Frederick H. Kranz